

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JAY PAUL DERATANY, individually, and as)	
agent for JAY PAUL DERATANY & ASSOC.,)	
LTD, a Illinois Corporation,)	
)	
Plaintiffs,)	No. 08 CV 3372
v.)	
)	Judge Shadur
DELL FINANCIAL SERVICES, a Texas)	
Corporation, and LTD FINANCIAL SERVICES,)	
L.P., a Texas Corporation, individually and as)	
agent of DELL,)	
)	
Defendants.)	

MOTION FOR ENLARGEMENT OF TIME

Defendant LTD FINANCIAL SERVICES, L.P. (“LTD”), by and through its undersigned counsel, David M. Schultz and Stephen D. Vernon, pursuant to Federal Rule of Civil Procedure 6(b), respectfully requests that this Court grant it a 28 day enlargement of time to file a responsive pleading to Plaintiff’s Complaint and in support thereof, states as follows:

1. Plaintiff's Complaint purports to state claims under the Fair Debt Collection Practices Act and various state law theories.

2. This matter was originally filed in Illinois state court in the Circuit Court of Cook County. Defendant Dell Financial Services was served on or about May 12, 2008 and Defendant LTD was served on or about May 13, 2008.

3. Defense counsel was recently retained and the matter was removed from state court on June 11, 2008.

4. Pursuant to the Federal Rules of Civil Procedure, Defendant's answer or otherwise responsive pleading is currently due June 18, 2008. Fed.R.Civ.P. 81(c); Fed.R.Civ.P. 6(a)(1); Fed.R.Civ.P. 6(a)(2).

5. Defendant hereby requests an additional 28 days from June 18, 2008 to answer or otherwise respond to Plaintiff's Complaint, up to and including July 16, 2008.

6. This time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation. This time is necessary to analyze the pleading and prepare the appropriate response.

7. Defense counsel contacted Plaintiff regarding this motion and has not yet heard from Plaintiff whether there is any objection to the extension.

WHEREFORE, Defendant, LTD FINANCIAL SERVICES, L.P., respectfully requests that this Court grant it a 28 day enlargement of time, to and including July 16, 2008, in which to answer or otherwise plead to Plaintiff's Complaint.

LTD FINANCIAL SERVICES, L.P.

By: s/Stephen D. Vernon

One of Its Attorneys

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